

REQUIRED STATEMENT TO ACCOMPANY  
ALL MOTIONS FOR RELIEF FROM STAY

All Cases: Debtor(s) Eric C Thomas Case No. 21-05531 Chapter 13

Wilmington Savings Fund Society,  
FSB, d/b/a Christiana Trust, not  
individually but as trustee for Pretium  
Mortgage Acquisition Trust

All Cases: Moving Creditor Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as trustee for Pretium Mortgage Acquisition Trust Date Case Filed 4/27/2021

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) \_\_\_\_\_

Chapter 13: Date of Confirmation Hearing 6/14/2021 Or Date Plan Confirmed \_\_\_\_\_

Chapter 7: ☐ No-Asset Report Filed on \_\_\_\_\_

☐ No-Asset Report not filed, Date of Creditors Meeting \_\_\_\_\_

1. Collateral

a. ☒ Home

b. ☐ Car Year, Make, and Model \_\_\_\_\_

c. ☐ Other (describe) \_\_\_\_\_

2. Balanced Owed as of July 1, 2021 \$53,497.41, principal balance, \$79,255.60 payoff balance

Total of all other Liens against Collateral \$

In Chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition:

3. Attached as Exhibit E

4. Estimated Value of Collateral (must be supplied in *all* cases) \$157,000.00 (based on debtors Schedule A/B)

5. Default

a. ☐ Pre-Petition Default

Number of months \_\_\_\_\_ Amount \$

b. ☒ Post-Petition Default

i. ☒ On direct payments to the moving creditor

Number of months 3 Amount \$1,970.49

ii. ☐ On payments to the Standing Chapter 13 Trustee

Number of Months \_\_\_\_\_ Amount \$ through

6. Other Allegations

a. ☐ Lack of Adequate Protection § 362(d)(1)

i. ☐ No insurance

ii. ☐ Taxes unpaid Amount \$

iii. ☐ Rapidly depreciating asset

iv. ☐ Other (describe) \_\_\_\_\_

b. ☐ No Equity and not Necessary for an Effective reorganization § 362(d)(2)

c. ☐ Other "Cause" § 362(d)(1)

i. ☐ Bad Faith (describe) \_\_\_\_\_

ii. ☐ Multiple Filings

iii. ☐ Other (describe) \_\_\_\_\_

d. Debtor's Statement of Intention regarding the Collateral

i. ☐ Reaffirm ii. ☐ Redeem iii. ☐ Surrender iv. ☒ No Statement of Intention Filed

Date: July 6, 2021 /s/ Josephine J. Miceli

Counsel for Movant